

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: COVIDIEN HERNIA MESH  
PRODUCTS LIABILITY LITIGATION  
NO. II,**

**This Document Relates To:**

**Deborah Gates**

**MDL No. 1:22-md-03029-PBS**

**SHORT FORM COMPLAINT**

Plaintiff(s) file(s) this Short Form Complaint pursuant to Case Management Order No. 7 and is to be bound by the rights, protections, and privileges and obligations of that Order. Plaintiff(s) hereby incorporate(s) the Master Complaint in MDL No. 3029 by reference. Plaintiff(s) further show(s) the Court as follows:

1. The name of Plaintiff/the person implanted with Defendants' Hernia Mesh Device(s):

Deborah Gates

2. The name of any Consortium Plaintiff (if applicable):

Not applicable

3. Other Plaintiff(s) and Capacity (i.e., administrator, executor, guardian, conservator):

Not applicable

4. Current State of Residence:

Alabama

5. District Court and Division in which action would have been filed absent direct filing:

District of Massachusetts; Eastern Division

6. Defendants (Check Defendants against whom Complaint is made):

X     A. Covidien LP

X     B. Sofradim Production SAS

☐ C. Other (please list: \_\_\_\_\_)

7. Identify which of Defendants' Hernia Mesh Device(s) was/were implanted (Check all device(s) implanted):

- ☐ Dextile Anatomical Mesh
- ☐ Parietene DS Mesh
- ☐ Parietene Polypropylene Mesh
- ☐ Parietene Progrip Mesh
- ☐ Parietex Composite Mesh
- ☐ Parietex Composite Mono PM Mesh
- ☐ Parietex Composite PCO-OS or PCO-OB Mesh
- ☐ Parietex Composite Ventral Patch
- ☐ Parietex Hydrophilic 2D Mesh
- ☐ Parietex Hydrophilic 3D Mesh
- ☐ Parietex Hydrophilic Anatomical Mesh
- ☐ Parietex Monofilament Polyester Mesh
- ☐ Parietex Optimized Composite Mesh
- ☐ Parietex Plug & Patch
- ☐ Parietex ProGrip
- ☐ ProGrip Laparoscopic
- ☐ SurgiPro
- ☐ SurgiPro Plug & Patch
- X Symbotex Composite Mesh
- ☐ Other (please list in space provided below):  
\_\_\_\_\_

8. Defendants' Hernia Mesh Device(s) about which Plaintiff is making a claim (Check all applicable device(s)):

- ☐ Dextile Anatomical Mesh
- ☐ Parietene DS Mesh
- ☐ Parietene Polypropylene Mesh
- ☐ Parietene Progrip Mesh
- ☐ Parietex Composite Mesh
- ☐ Parietex Composite Mono PM Mesh
- ☐ Parietex Composite PCO-OS or PCO-OB Mesh
- ☐ Parietex Composite Ventral Patch
- ☐ Parietex Hydrophilic 2D Mesh
- ☐ Parietex Hydrophilic 3D Mesh
- ☐ Parietex Hydrophilic Anatomical Mesh
- ☐ Parietex Monofilament Polyester Mesh
- ☐ Parietex Optimized Composite Mesh
- ☐ Parietex Plug & Patch
- ☐ Parietex ProGrip
- ☐ ProGrip Laparoscopic
- ☐ SurgiPro
- ☐ SurgiPro Plug & Patch
- X     Symbotex Composite Mesh
- ☐ Other (please list in space provided below):  
\_\_\_\_\_



- X Count XIV – Fraudulent Concealment
- ☐ Count XV – Wrongful Death
- ☐ Count XVI – Loss of Consortium
- X Count XVII – Punitive Damages
- ☐ Other Count(s) (please identify and state factual and legal bases for other claims not included in the Master Complaint below):
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- X Jury Trial is Demanded as to All Counts
- ☐ Jury Trial is NOT Demanded as to All Counts; if Jury Trial is Demanded as to Any Count(s), identify which ones (list below):
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Respectfully submitted,

/s/ Amanda D. Summerlin

Amanda D. Summerlin  
(AL Bar No. 9801W63J)

**Taylor Martino, P.C.**

455 Saint Louis Street, Suite 2100  
Mobile, AL 36602

Tel: (251) 433-3131

Fax: (251) 433-4207

Email: [asummerlin@taylormartino.com](mailto:asummerlin@taylormartino.com)

**Attorneys for Plaintiff**